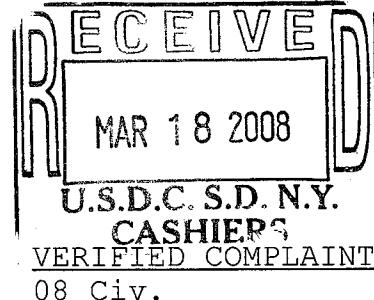


JUDGE DUCHWALD

MICHAEL J. GARCIA
 United States Attorney for the
 Southern District of New York
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UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

-----X
 :
 UNITED STATES OF AMERICA, :
 :
 - v - :
 :
 \$26,081 in UNITED STATES CURRENCY, :
 :
 Defendant-in-rem.
 -----X



Plaintiff United States of America, by its attorney,
 Michael J. Garcia, United States Attorney for the Southern
 District of New York, for its complaint alleges as follows:

I. JURISDICTION AND VENUE

1. This action is brought pursuant to 21 U.S.C. § 881 by the United States of America seeking the forfeiture of \$26,081 in United States currency (the "defendant-in-rem currency");

2. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1345 and 1355. Venue is proper under 28 U.S.C. § 1335(a) because the actions giving rise to forfeiture took place in the Southern District of New York and the defendant-in-rem currency was found and seized in the Southern District of New York.

3. The defendant-in-rem currency is presently in the custody of the United States Marshals Service ("USMS") Seized Asset

Deposit Fund Account held at the Federal Reserve Bank.

II. PROBABLE CAUSE FOR FORFEITURE

4. On or about August 15, 2007, New York City Police Department ("NYPD") officers conducted a vehicle stop of a 2001 Acura MDX on East 180th Street and Boston Road in Bronx, New York. The driver of the vehicle was identified as Juan Dilone ("Dilone").

5. Upon approaching the vehicle, the officers noticed that the vehicle had a forged temporary Pennsylvania license plate. Dilone was arrested and charged with Possession of a Forged Instrument.

6. Upon arresting Dilone, the officers observed a white plastic bag in the vehicle. The bag contained \$26,081 in United States currency in the following denominations: (a) 69 \$100 bills; (b) 48 \$50 bills; (c) 768 \$20 bills; (d) 107 \$10 bills; (e) 58 \$5 bills; and (f) 61 \$1 bills.

7. Dilone made verbal statements to the officers, during which he stated in substance that the money was to purchase an automobile.

8. An ion-scan was conducted on the currency which registered high traces of cocaine.

9. Dilone is currently unemployed and has a prior narcotic criminal history.

10. On or about December 14, 2007, the Drug Enforcement Administration received a Seized Asset Claim form from Juan Dilone,

claiming that he is the owner of the defendant-in-rem currency.

III. CLAIM FOR FORFEITURE

11. Incorporated herein are the allegations contained in paragraphs one through ten of the Verified Complaint.

12. Pursuant to 21 U.S.C. § 881(a)(6), all moneys furnished or intended to be furnished in exchange for a controlled substance, all proceeds traceable to such exchanges, and all moneys used or intended to be used to facilitate such exchanges, in violation of Title 21 of the United States Code, are subject to seizure and forfeiture to the United States, and no property right exists in such proceeds.

13. The defendant-in-rem currency is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6) because there is probable cause to believe that it constitutes moneys intended to be furnished in exchange for a controlled substance, and/or proceeds traceable to such exchanges, and/or moneys used or intended to be used to facilitate such exchanges, in violation of Title 21 of the United States Code.

14. By reason of the above, the defendant-in-rem currency became, and is, subject to forfeiture to the United States of America, pursuant to 21 U.S.C. § 881(a)(6).

WHEREFORE, plaintiff United States of America prays that process issue to enforce the forfeiture of the defendant-in-rem currency and that all persons having an interest in the defendant-

in-rem currency be cited to appear and show cause why the forfeiture should not be decreed, and that this Court decree forfeiture of the defendant-in-rem currency to the United States of America for disposition according to law, and that this Court grant plaintiff such further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Dated: New York, New York
March 17, 2008

MICHAEL J. GARCIA
United States Attorney for the
Southern District of New York
Attorney for the Plaintiff
United States of America
By: 
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VERIFICATION

STATE OF NEW YORK)
COUNTY OF NEW YORK :
SOUTHERN DISTRICT OF NEW YORK)

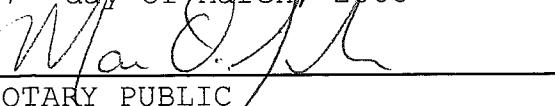
LISA DE RIENZO, being duly sworn, deposes and says that she is a Detective with the New York Police Department, and as such has responsibility for the within action; that she has read the foregoing complaint and knows the contents thereof, and that the same is true to the best of her own knowledge, information and belief.

The sources of deponent's information and the grounds of her belief are from official records and files of the New York Police Department, the State of New York, the United States Government, and information obtained directly by deponent during an investigation of alleged violations of Title 21 of the United States Code.



LISA DE RIENZO
Detective
New York Police Department

Sworn to before me this
17th day of March, 2008



NOTARY PUBLIC

MARCO DASILVA
Notary Public, State of New York
No. 01DA6145603
Qualified in Nassau County
My Commission Expires May 8, 2010